

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: : **CHAPTER 13**
HEATHER L. LEHR : **CASE NO.: 1:17-bk-03926-HWV**
:

DEBTOR'S MOTION TO TERMINATE WAGE ATTACHMENT

AND NOW COMES, Debtor, Heather L. Lehr, by and through her attorneys, Upright Law, who hereby files this Motion to Terminate Wage Attachment and in support thereof states:

1. Debtor filed a Chapter 13 Petition on or about September 22, 2017.
2. This Honorable Court approved a wage attachment of Debtor's wages on November 1, 2017 and further directed Dallastown Area School District to withhold funds from Debtor's wages to pay the Chapter 13 Trustee.
3. Debtor files this motion seeking an Order terminating said wage attachment because the case is now complete, and no further payments are due to the Chapter 13 Trustee.

WHEREFORE, Debtor respectfully requests that this Court enter an Order directing the above-mentioned employer to terminate the payments to the Chapter 13 Trustee.

Respectfully Submitted,

UPRIGHT LAW LLC

Dated: December 8, 2022

/s/ Chad J. Julius
ID# 209496
8150 Derry Street
Harrisburg, PA 17111.5260
717.909.5858

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PROOF OF SERVICE

AND NOW, this 8th day of December 2022, I, Dera Shade, with Jacobson, Julius & Harshberger, attorneys for the Debtor, hereby certify that on this day I served the within *Motion to Terminate Wage Attachment* upon the following persons by forwarding the same via CM/ECF and/or first-class mail—

Jack N. Zaharopoulos, Esq.
8125 Adams Drive Suite A
Hummelstown, PA 17036

Office of U.S. Trustee
228 Walnut Suite 1190
Harrisburg, PA 17108

Attn: Jodi Schuer
Payroll Supervisor
Dallastown Area School District
700 New School Lane
Dallastown, Pennsylvania 17313

By: /s/Dera Shade
Dera Shade, Paralegal

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UPON CONSIDERATION of the above-referenced Debtor, Heather L. Lehr, having filed a *Motion to Terminate Wage Attachment* under Chapter 13 of the Bankruptcy Code;

IT IS HEREBY ORDERED that the Motion is GRANTED and that the entity from whom Debtor receives income:

Attn: Jodi Schuer
Payroll Supervisor
Dallastown Area School District
700 New School Lane
Dallastown, Pennsylvania 17313

shall terminate all deductions and wage attachments remitted to Chapter 13 Trustee, Jack N. Zaharopoulos, from said Debtor's income, previously ordered by this Honorable Court on November 1, 2017.